

October 19, 2005

Cynthia W. Lie
Assistant United States Attorney
1 Courthouse Way
Suite 9200
Boston MA 02210

Re: United States vs. James Goodwyn
Criminal Docket No. 1:05 cr 10220

Dear Attorney Lie:

Pursuant to Rules 116.1 (C)(1) and 116.3 of the Local Rules of the United States District Court for the District of Massachusetts, the defendant requests discovery including the following:

Rule 116.2 Disclosure of Exculpatory Evidence

The government has disclosed that the confidential witness has committed perjury in a prior criminal trial. The defendant requests any transcripts of the trial testimony in the possession of the government with references to those parts of the testimony that are untruthful. If the government does not possess any transcripts, the defendant requests the substance of the defendant's testimony with specific references to the parts of the testimony that were untruthful.

Please call me if you have any questions.

Very Truly Yours,

Joseph F. Krowski Jr.

JFKJR/lp